



File Code: 1570
15-02-00-0071-219
Date: May 11, 2015

Rose Pugliese
Chair, Mesa County Board of Commissioners
544 Rood Avenue
Grand Junction, Colorado 81502-5010

Dear Commissioner Pugliese:

On February 10, 2015, you, Commissioner John Justman, and Commissioner Scott McInnis filed an objection on behalf of Mesa County regarding the White River National Forest's *Oil and Gas Leasing Decision*. The legal notice for that project was published in the *Glenwood Springs Post Independent* on December 12, 2014, which initiated the 60-day objection period. Your objection was timely.

You identified three issues in your letter: 1) methodology of determining future development, 2) socio-economic impacts of restricting oil and gas leasing, and 3) effects of alternatives on tourism, grazing, and forest product availability. However, only the first of these issues met the requirements of being previously commented on as required by 36 Code of Federal Regulations (CFR) 219.55(a) (3) and (b). This letter is my written response to that objection, as required by 36 CFR 219.56(g).

To satisfy 36 CFR 219.57(a), an objection resolution meeting was held with the objectors in Glenwood Springs, Colorado on April 27, 2015. John Justman and Randy Price attended, and other representatives for Mesa County joined the meeting by phone. I was in attendance as was Scott Fitzwilliams, Supervisor of the White River National Forest and staff from both the forest and the Rocky Mountain Regional Office. We were unable to resolve your objections at that meeting.

Project Subject to Objection

The White River National Forest proposes to make portions of that Forest available for oil and gas leasing, to adopt stipulation requirements for use on those lands, to close other portions of the Forest to oil and gas leasing, and to amend the White River National Forest Land and Resource Management Plan (LRMP).

Three alternatives were considered in detail in this project's final environmental impact statement (FEIS). These alternatives included:

- Alternative A – No Action (current management);
- Alternative B (Scenario 1 & 2) – No New Leasing;
- Alternative C (Scenario 1 & 2) – Proposed Action.



Scenario 1 assumes the 39 leased/undeveloped parcels would expire or terminate and subsequently be closed to future leasing through management direction (Alternative B) or a combination of closed to future leasing through management direction and available for lease (Alternative C).

Scenario 2 assumes the 39 leased/undeveloped parcels would not expire and would be developed under the 1993 WRNF Oil and Gas Leasing stipulations and/or stipulations they were leased under. As detailed in the Draft Record of Decision (DROD) for this project, a combination of Alternatives B and C was selected for implementation.

Objection Responses

Following are summaries of the objection issues, paraphrased from the actual objections filed by the addressee. The agency response then follows each summarized issue.

Objection Issue 1: The methodology of looking to the past to determine future potential is faulty; the proposed closure of the Willow Creek area fails to recognize the significant production potential in that area.

Objection Response –The determination of future production potential did not rely solely on the presence or absence of past development. The leasing analysis also considered geologic potential, past production, and expressions of interest in lease development. Detail on determination of future potential is disclosed and discussed. (FEIS Section 1.8, Section 2.4.2, Table 12, Section 3.2.10, the Mineral Specialist Report).

In the DROD, the Responsible Official considered future potential, other resource concerns, and public input when deciding whether or not to make any given area available for future leasing.

Suggested Remedies:

In your objection, you asked that the Forest Service reconsider leasing restriction in the White River National Forest, especially the portions of the Willow Creek area located in Mesa County and to revise the DROD to eliminate those restrictions.

Conclusion:

Based on my review of your objection, the FEIS and objection record, I find no violation of law, regulation or policy. In addition, my review has led me to conclude that no changes to the analysis documents are needed as it relates to your objection. However, I am instructing the Responsible Official, Forest Supervisor Scott G. Fitzwilliams to address issues raised by other objectors. As required by 36 CFR 219.58(a), Forest Supervisor Fitzwilliams cannot sign a decision for this project until all instructions have been addressed. This response is not subject to further administrative review by the Forest Service or the Department of Agriculture pursuant to 36 CFR 219.57(b)(3).

If you have any questions or concerns regarding this response, please contact Nancy Miller at 303-275-5373 or njmiller@fs.fed.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Bedwell', with a stylized flourish at the end.

JAMES S. BEDWELL
Acting Deputy Regional Forester
Reviewing Officer

cc: Scott Fitzwilliams, Sarah Hankens, Wendy Haskins